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08-CR-00086-INFO

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KARIMAH BAILEY

Defendant.

NO. CR08-86 JLR

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

**(Making a False Material Representation to a Federal Agency)**

On or about February 22, 2006, in King County, within the Western District of Washington, in a matter within the jurisdiction of the United States Department of Labor ("Department of Labor"), an Agency of the United States, KARIMAH BAILEY, in her capacity as treasurer of American Federation of Government Employees Local 3197, did willfully and knowingly make a false material representation in a report required to be filed with the Department of Labor, that is, the annual financial report form LM-3 for the period January 1, 2005 through December 31, 2005, for American Federation of Government Employees Local 3197, to wit:

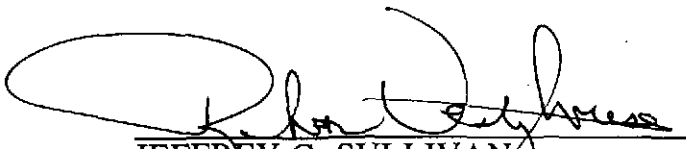
a. In the 2005 LM-3 Report, Question 15 reads as follows: "During the reporting period did your organization discover any loss or shortage of funds or other property?" KARIMAH BAILEY responded to this question, "No." KARIMAH BAILEY made this

1 statement knowing that it was materially false, fictitious, and fraudulent because it did not  
2 acknowledge the money she had knowingly converted to her own use from AFGE LU 3197  
3 funds during the relevant time period.

4 b. In the 2005 LM-3 Report, KARIMAH BAILEY stated in response to Question 24  
5 that the total gross salary and other disbursements received by her from LU 3197 was "\$2150."  
6 KARIMAH BAILEY made this statement knowing that it was materially false, fictitious, and  
7 fraudulent because it did not acknowledge the money she had knowingly converted to her own  
8 use from AFGE LU3197 funds during the relevant time period. The non-fraudulent answer  
9 would have been thirty-six thousand, five hundred and seventy-nine dollars and fifteen cents  
10 (\$36,579.15).

11 All in violation of Title 18, United States Code, Section 1001.

12 DATED this 18<sup>th</sup> day of March, 2008.

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JEFFREY C. SULLIVAN  
United States Attorney

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ANNETTE L. HAYES  
Assistant United States Attorney

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MATTHEW D. DIGGS  
Assistant United States Attorney